

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BARBARA E. VARNER,

: CIVIL ACTION

Plaintiff

: NO. 1:CV 01-0725

vs.

COMMONWEALTH OF PENNSYLVANIA,
NINTH JUDICIAL DISTRICT, CUMBERLAND
COUNTY COURT OF COMMON PLEAS,
ET AL.,

: JUDGE YVETTE KANE

Defendants.

**MOTION TO EXCEED PAGE LIMITATIONS
OF SUMMARY JUDGMENT BRIEF**

1. The scheduling order in this case requires all dispositive motions to be filed by December 19, 2003.
2. Court Defendant, Commonwealth of Pennsylvania, Ninth Judicial District, Cumberland County Court of Common Pleas and Individual Defendants S. Gareth Graham and Joseph Osenkarski (Defendants) are currently preparing their individual Motions for Summary Judgment for filing.
3. Pursuant to Local Rule 7.8 (b)(3), the Defendants jointly seek authorization to exceed the fifteen (15) page or 5,000 word limit.
4. Defendant Cumberland County and Plaintiff Barbara E. Varner concur in this request.
5. The herein action is a Title VII claim by an employee of the Probation Department of the Cumberland County Court System. More than twenty (20) depositions

have been taken. Defendants raise numerous issues and require the extra pages to fully inform the Court of the several issues presented.

6. Court Defendant respectfully seeks permission to submit a brief, not to exceed forty (40) pages in length in support of its Motions for Summary Judgment. Individual Defendants respectfully request permission to submit briefs, not to exceed thirty (30) pages in length in support of their Motions for Summary Judgment. Defendants will make every effort to keep the briefs as concise as possible, but due to the nature of the case and in the abundance of caution, Defendants request permission to exceed the page limit.

WHEREFORE, Judicial Defendant, Commonwealth of Pennsylvania, Ninth Judicial District, Cumberland County Court of Common Pleas and Individual Defendants S. Gareth Graham and Joseph Osenkarski respectfully request this Honorable Court to Grant their Joint Motion to Extend the Length of Brief.

Respectfully submitted,

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***Cmwlth. of Pennsylvania, Ninth Judicial District,
Cumberland County Court Of Common Pleas***

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